

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Omou Staton	:	Chapter 13
	:	
Debtor	:	Case No.: 17-11141

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MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Comes Now Omou Staton, hereinafter referred to as “Debtor” and moves this Honorable Court to vacate its February 12, 2018 Order Modifying Section 362 Automatic Stay and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about February 17, 2017.
2. The Chapter 13 bankruptcy matter was assigned case number 17-11141.
3. The Chapter 13 Plan was confirmed by this Honorable Court on August 30, 2017.
4. On or about October 24, 2017 the Debtor and mortgagee, Bank of America entered into a Stipulation in Settlement of a Motion for Relief.
5. On or about February 2, 2018, Bank of America, through their counsel filed a Certificate of Default alleging that the Debtor has failed to make her mortgage payments in accordance with the October 24, 2017 Stipulation in Settlement.
6. In furtherance of the February 2, 2018 Certificate of Default, this Honorable Court entered an Order on February 12, 2018 modifying the Automatic Stay in favor of Bank of America.

7. In February, 2018 the Debtor attempted to pay towards the mortgage delinquency, however, her cashier's check was returned because it was not sufficient to cure the mortgage post-Stipulation.

8. The Debtor is desirous of maintaining her interest in the real property known as and located at 1336 East Sharpnack Street, Philadelphia, PA 19150.

9. Accordingly, The Debtor is prepared to cure any and all amounts of the post Stipulation arrears and plans on doing so prior to the hearing in the instant matter.

WHEREFORE, for the reasons stated herein, the Debtor respectfully requests that this Honorable Court Vacate its November 28, 2017 Order Modifying the Automatic Stay.

Respectfully submitted,

Dated: February 19, 2018

/s/ Brad J. Sadek, Esquire  
Brad J. Sadek, Esquire  
Sadek and Cooper  
1315 Walnut Street  
Suite 502  
Philadelphia, PA 19107